

Exhibit A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

v.

KEONNE RODRIGUEZ and
WILLIAM LONERGAN HILL,

Defendants

Case No. 1:24-cr-00082-RMB

DECLARATION OF KEONNE RODRIGUEZ

1. I am a defendant in the above-referenced action, and I hereby submit this Declaration, pursuant to 28 U.S.C. § 1746, in support of my Motion to Suppress.

2. At approximately 5:30 a.m. on April 24, 2024, law enforcement agents arrived at my home in Pennsylvania and demanded through a megaphone that I come outside.

3. Within minutes, I walked outside, backward, toward the agents with my hands up, as instructed.

4. I was handcuffed and taken to what appeared to be a local police department vehicle.

5. While in custody, the agents began searching my home.

6. Within an hour of my arrest, I was moved by an agent from the police vehicle to an unmarked vehicle. Another agent was in the driver's seat of the unmarked vehicle.

7. While seated in the unmarked vehicle, another unidentified agent entered the car and sat in the passenger's seat. This agent asked me to provide passwords to my phone and

computer devices. He stated, in substance, that if I did not provide the passwords to my phone and computer devices, agents would use my biometrics to access those devices.

8. I stated that I wanted to first speak with a lawyer before providing any passwords.

9. I recall that the same agent responded, in substance, “just make it easy; we don’t have to do all of this.”

10. I stated again that I would not provide any passwords without first speaking with a lawyer. The agent left the vehicle.

11. The agent did not provide me with a *Miranda* warning.

12. Approximately one hour later, a different unidentified agent approached the unmarked vehicle.

13. The agent removed me from the unmarked vehicle to change my handcuffs. While changing my handcuffs, the agent asked for the PIN to the safe in my home. The agent stated, in substance, that if I did not provide the PIN, law enforcement would break open my safe.

14. I gave the agent the PIN to the safe.

15. The agent did not provide me with a *Miranda* warning before questioning me.

16. Inside the safe was, among other things, a laminated card with a password written on it. The password provided access to a secure server that was seized by law enforcement from my house. The server contained, among other things, business records for Samurai Wallet.

17. After providing the unidentified agent with the PIN to my safe, I was returned to the unmarked vehicle. Another agent, who I believe was from the NYPD, stood outside the vehicle.

18. The NYPD officer asked me whether I owned any 3D printed guns, whether I had any 3D printed guns in the house, and whether I had materials to place inside the 3D printer. I answered “no” to each of these questions.

19. The NYPD officer did not provide me with a *Miranda* warning before questioning me.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 29, 2025.



KEONNE RODRIGUEZ